

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

IN RE: IKO ROOFING SHINGLE PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO ALL ACTIONS)))))))	 MDL No. 2104
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ATTACHMENT A

TENTATIVE AGENDA FOR INITIAL CONFERENCE

- I. Issues of Disqualification or Recusal
- II. Jurisdictional Challenges
- III. Organization of Attorneys
 - A. Approve Liaison Counsel
 - B. Determine the need for steering committees and appointment of counsel to serve on the necessary committees.
- IV. Prospect of Settlement/Mediation/ADR
- V. Narrowing of Issues

Counsel has been instructed to prepare a brief written statement, jointly if possible, indicating their preliminary understanding of the critical factual and legal issues at issue in this litigation. These matters will be discussed in an attempt to narrow the scope of discovery.
- VI. Discovery
 - A. Counsel should confer prior to the Initial Conference, as is required by Fed. R. Civ. P. 26(f). A proposed discovery plan should be provided to the court no later than February 3, 2010.
 - B. The issues presented in the proposed plan will help frame the schedule for this litigation,

including issues of joinder, amendment of pleadings, motion deadlines, and completion of discovery.

C. A discovery scheduling order will be entered pursuant to Fed. R. Civ. P. 16(b).

D. Procedures for handling protective orders, as well as claims of confidentiality and privilege, will be set forth.

E. Procedures for resolving discovery disputes will be established.

F. Management of discovery issues, including the feasibility of a uniform numbering system and the use of document depositories and computerized storage.

G. Consideration of establishment of a common electronic data base for all discovery materials, including but not limited to, documents, photographs, reports, depositions, and stipulations.

VII. A. The court will set the hearing for class certification at the close of the Initial Conference.

B. A separate discovery schedule for determining class issues will be entered.